

**From:** [Turner, Philip](#)  
**To:** [Franks, Jessica](#); [Rauscher, Jon](#)  
**Cc:** [McCormick, Karen](#); [Taylor, Patricia-A](#); [Meyer, John](#); [Villarreal, Chris](#); [Sanchez, Carlos](#); [Miller, Garyg](#)  
**Subject:** RE: GRETS 2014 Final Report  
**Date:** Monday, November 02, 2015 2:08:37 PM

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Hi Jessica,

Thank you for the opportunity to review this document. I certainly agree that the Reference area location should be re-considered. There are several bayous feeding into Galveston Bay that appear to contain very little contamination. In addition, coastal areas not close to Galveston Bay entrance, and further south may be appropriate.

Sections 8.1.3 and 8.2.3 appear to blame the San Jacinto Waste Pits solely for dioxin/furans in the HSC, Galveston Bay, and tissues found as part of this study. This is inappropriate as there are numerous legacy sources of dioxins/furans throughout the entire watershed. True, it is not surprising that there are dioxins/furans present, but it is surprising if tissues analyzed near or out past Galveston were influenced by the waste pits.

TEQ analysis alone might give this impression, however congener fingerprinting exercises have shown that waste pits dioxin/furan signatures do not extend more than a few miles downstream the site, but other signatures can be found throughout the watershed. The waste pits are dominated by TCDDs and TCDFs, however the rest of the watershed is composed of primarily Octa-furans. Very little TCDDs and TCDFs are found in the HSC, Galveston Bay, or elsewhere.

Other sources should be discussed, or the reference to the San Jacinto Waste Pits should be removed. I might would suggest merely stating the the entire watershed has numerous sources of legacy dioxin/furan contamination... similar to that of PCBs and organochlorine pesticides.

Section 8.1.3 also states that no other tissue studies have been performed. This is also not true. Fish and crab tissues have been collected surrounding the Waste Pits. The Texas TMDL program has also taken tissue samples all throughout the watershed. Baylor University also analyzed fish tissue samples near the pits. Unfortunately, fingerprinting tissue samples is nearly impossible, as organisms do somewhat alter congeners during metabolism.

Section 9.2 should discuss other legacy sources of dioxins/furans, or reference to the San Jacinto Waste Pits should be removed. Again, although the Waste Pits are a source to the area, their influence is rather limited in spatial extent as compared to other legacy sources.

Feel free to contact me if you would like to discuss further

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**From:** Franks, Jessica  
**Sent:** Monday, November 02, 2015 10:53 AM  
**To:** Rauscher, Jon; Turner, Philip



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**Cc:** McCormick, Karen; Taylor, Patricia-A  
**Subject:** GRETS 2014 Final Report

Good morning all,

Attached is the draft final report for the GRETS 2014 survey to evaluate the need to move the reference area to another location. The attached documents includes the edits recommended by Karen and Patty via track changes. Karen has asked that the two of you review this document. Sections 8, 9 and 10 are the discussion, conclusion, and recommendations which are not many pages. I have used track changes to show my edits. One thing I have not done is move the tables closer to the paragraph where they are being discussed as they would spill into another page.

I would appreciate your speedy comments as this is due to HQ today. I apologize that you were not included sooner.

Thanks

Jessica

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